

BLOOMFIELD LAW GROUP, INC.

A Professional Corporation

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Attorney for Plaintiff Nader Shaterian

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

NADER SHATERIAN,

Plaintiff,

vs.

WELLS FARGO BANK, NATIONAL
ASSOCIATION; CAL-WESTERN
RECONVEYANCE CORPORATION;
and DOES 1-50, Inclusive

Defendants.

) CASE NO. C 11-00920 SC

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**~~PROPOSED~~ ORDER ON STIPULATION
[DOC #65] FOR CONTINUANCE OF
OPPOSITION AND REPLY DUE DATES
ON NOTICED MOTIONS SCHEDULED
FOR OCTOBER 21, 2011**

Date: October 21, 2011

Time: 10:00 a.m.

Courtroom: 1, San Francisco Courthouse

Judge: Hon. Samuel Conti

The parties continue to discuss possible settlement of this matter. Earlier in September 2011, Defendant Wells Fargo was granted by stipulation a two-week extension (Doc #59) to respond to the Second Amended Complaint. Plaintiff now seeks an extension to respond to Wells Fargo's Motion to Dismiss and Motion to Strike. The parties have stipulated to extend Plaintiff's time to oppose these motions to October 3, 2011, and to extend Defendant's time to reply to opposition to these motions to October 11, 2011, and seek the Court's approval for these extensions. (Doc #65)

STIPULATION

Plaintiff Nader Shaterian ("Plaintiff") and Defendants Wells Fargo Bank, N.A. and Cal-Western Reconveyance Corporation, (collectively, "Defendants"), by and through their respective counsel,

1 hereby stipulate and request this Court to extend the date by which any opposition to (1) Defendant
2 Wells Fargo's Motion to Dismiss (Doc #60) and (2) Defendant Wells Fargo's Motion to Strike
3 Portions of Complaint (Doc #61) must be filed and served from September 16, 2011 to October 3,
4 2011. The parties also stipulate and request the Court to extend the date by which any reply papers
5 must be filed and served from September 23, 2011 to October 11, 2011

6 Dated: September 13, 2011

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8 By: /s/ Neil Jon Bloomfield
9 Neil Jon Bloomfield
10 Attorneys for Plaintiff Nader Shaterian

11 ANGLIN, FLEWELLING, RASMUSSEN,
12 CAMPBELL & TRYTTEN LLP

13 By: /s/ Viddell Lee Heard
14 Viddell Lee Heard
15 Attorneys for Defendant Wells Fargo
16 Bank, National Association

17 WRIGHT, FINLAY & ZAK, LLP

18 By: /s/ Nicole K. Neff
19 Nicole K. Neff, Esq.
20 Attorneys for Defendant Cal-Western
21 Reconveyance Corporation
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DECLARATION OF CONSENT

Pursuant to General Order No. 45, Section X(B) regarding signatures, I attest under penalty of perjury that concurrence in the filing of this document has been obtained from the above-listed counsel for Defendants Wells Fargo Bank, N.A. and Cal-Western Reconveyance Corporation

Dated: September 13, 2011

/s/ Neil Jon Bloomfield_____
Neil Jon Bloomfield

ORDER

PURSUANT TO STIPULATION OF THE PARTIES, IT IS HEREBY ORDERED that the date by which opposition to (1) Defendant Wells Fargo's Motion to Dismiss (Doc #60) and (2) Defendant Wells Fargo's Motion to Strike Portions of Complaint (Doc #61) shall be filed and served is extended from September 16, 2011 to October 3, 2011. The date by which any reply to opposition shall be filed and served is extended from September 16, 2011 to October 11, 2011.

Dated: September 20, 2011

